

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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MASSACHUSETTS BRICKLAYERS AND  
MASONS TRUST FUNDS, Individually and  
On Behalf of All Others Similarly Situated, : Civil Action No. 2:08-cv-03178-LDW-ARL  
: CLASS ACTION  
: NOTICE OF MOTION AND MOTION FOR  
: (1) FINAL APPROVAL OF CLASS ACTION  
: SETTLEMENT AND PLAN OF  
: ALLOCATION OF SETTLEMENT  
: PROCEEDS AND (2) AWARD OF  
: ATTORNEYS' FEES AND EXPENSES AND  
: LEAD PLAINTIFFS' EXPENSES  
: PURSUANT TO 15 U.S.C. §77z-1(a)(4)

Plaintiff, :  
vs. :  
DEUTSCHE ALT-A SECURITIES, INC., et :  
al., :  
Defendants. :  
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PLEASE TAKE NOTICE that Lead Plaintiffs hereby move the Court for entry of orders and/or judgments (1) finally approving the settlement of the Litigation, (2) approving the Plan of Allocation of settlement proceeds, and (3) awarding Lead Counsel attorneys' fees of 26.5% of the Settlement Amount, plus expenses incurred in the Litigation, plus interest on both. Defendants do not oppose this Motion. This Motion is based upon the Stipulation and Agreement of Settlement dated as of March 15, 2012 and the exhibits annexed thereto, the Memorandum of Law in Support of Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation of Settlement Proceeds, the Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and Lead Plaintiffs' Expenses Pursuant to 15 U.S.C. §77z-1(a)(4), the declarations filed in support thereof and all other proceedings herein. Accordingly, Lead Plaintiffs by and through Lead Counsel, will request this Court, before the Honorable Leonard D. Wexler, United States District Judge for the Eastern District of New York, at the Alfonse M. D'Amato, United States Courthouse, 100 Federal Plaza, Central Islip, New York, on July 11, 2012, at 11:00 a.m., to enter a Final Order and Judgment, an Order Approving Plan of Allocation of Settlement Proceeds, and an Order Awarding Attorneys' Fees and Expenses and Lead Plaintiffs' Expenses Pursuant to 15 U.S.C. §77z-1(a)(4).

DATED: June 1, 2012

Respectfully submitted,

LABATON SUCHAROW LLP  
CHRISTOPHER J. KELLER  
JONATHAN GARDNER

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s/ JONATHAN GARDNER  
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